

# EXHIBIT A

# EXHIBIT A

Electronically FILED by Superior Court of California, County of Riverside on 03/02/2022 11:53 AM  
 Case Number CVS201409 0000013556029 - W. Samuel Hamrick Jr., Executive Officer/Clerk of the Court By Miriam Verduzco, Clerk

PLD-PI-001

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|---|--|---|
| <b>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):</b><br>Alex Valenzuela (SBN 233783)/ Joseph H. Elias (SBN 332332)<br>DORDULIAN LAW GROUP<br>550 N. Brand Blvd Suite 1990<br>Glendale, CA, 91203<br><b>TELEPHONE NO:</b> 818-788-4919 <b>FAX NO. (Optional):</b> 818-827-2944<br><b>E-MAIL ADDRESS (Optional):</b> jelias@dlawgroup.com<br><b>ATTORNEY FOR (Name):</b> Irene Pardo  |  | <b>FOR COURT USE ONLY</b>               |
| <b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF</b> RIVERSIDE<br><b>STREET ADDRESS:</b> 30755-D Auld Road<br><b>MAILING ADDRESS:</b> 30755-D Auld Road<br><b>CITY AND ZIP CODE:</b> Murrieta, CA. 92563<br><b>BRANCH NAME:</b> Southwest Justice Center  |  |   |
| <b>PLAINTIFF:</b> Irene Pardo   |  |   |
| <b>DEFENDANT:</b> Costco Wholesale Corporation  |  |   |
| <input checked="" type="checkbox"/> DOES 1 TO 50 inclusive  |  |   |
| <b>COMPLAINT—Personal Injury, Property Damage, Wrongful Death</b>   |  |   |
| <input type="checkbox"/> <b>AMENDED (Number):</b>   |  |   |
| <b>Type (check all that apply):</b>   |  |   |
| <input type="checkbox"/> <b>MOTOR VEHICLE</b> <input checked="" type="checkbox"/> <b>OTHER (specify):</b> Premises Liability<br><input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death<br><input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify):   |  |   |
| <b>Jurisdiction (check all that apply):</b><br><input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE<br>Amount demanded <input type="checkbox"/> does not exceed \$10,000<br><input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000<br><input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)<br><input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint<br><input type="checkbox"/> from limited to unlimited<br><input type="checkbox"/> from unlimited to limited |  | <b>CASE NUMBER:</b><br><b>CVS201409</b> |

## 1. Plaintiff (name or names): Irene Pardo

alleges causes of action against defendant (name or names):

Costco Wholesale Corporation, and does 1 through 50, inclusive

## 2. This pleading, including attachments and exhibits, consists of the following number of pages:

## 3. Each plaintiff named above is a competent adult

a.  except plaintiff (name):

- (1)  a corporation qualified to do business in California
- (2)  an unincorporated entity (describe):
- (3)  a public entity (describe):
- (4)  a minor  an adult
  - (a)  for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
  - (b)  other (specify):
- (5)  other (specify):

b.  except plaintiff (name):

- (1)  a corporation qualified to do business in California
- (2)  an unincorporated entity (describe):
- (3)  a public entity (describe):
- (4)  a minor  an adult
  - (a)  for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
  - (b)  other (specify):
- (5)  other (specify):

Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

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| <b>SHORT TITLE:</b><br>Irene Pardo v. Costco Wholesale Corporation, et al. | <b>CASE NUMBER:</b><br><b>CVSW2201409</b> |
|--|---|

4.  Plaintiff (name):  
 is doing business under the fictitious name (specify):  
 and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person
- a.  except defendant (name): Costco Wholesale
    - (1)  a business organization, form unknown
    - (2)  a corporation
    - (3)  an unincorporated entity (describe):  
 (4)  a public entity (describe):  
 (5)  other (specify):
  - c.  except defendant (name):
    - (1)  a business organization, form unknown
    - (2)  a corporation
    - (3)  an unincorporated entity (describe):  
 (4)  a public entity (describe):  
 (5)  other (specify):
  - b.  except defendant (name):
    - (1)  a business organization, form unknown
    - (2)  a corporation
    - (3)  an unincorporated entity (describe):  
 (4)  a public entity (describe):  
 (5)  other (specify):
  - d.  except defendant (name):
    - (1)  a business organization, form unknown
    - (2)  a corporation
    - (3)  an unincorporated entity (describe):  
 (4)  a public entity (describe):  
 (5)  other (specify):

Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.
- a.  Doe defendants (specify Doe numbers): 1 through 50 were the agents or employees of other named defendants and acted within the scope of that agency or employment.
  - b.  Doe defendants (specify Doe numbers): 1 through 50 are persons whose capacities are unknown to plaintiff.
7.  Defendants who are joined under Code of Civil Procedure section 382 are (names):
8. This court is the proper court because
- a.  at least one defendant now resides in its jurisdictional area.
  - b.  the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
  - c.  injury to person or damage to personal property occurred in its jurisdictional area.
  - d.  other (specify):
9.  Plaintiff is required to comply with a claims statute, and
- a.  has complied with applicable claims statutes, or
  - b.  is excused from complying because (specify):

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|---|------------------------------------|
| SHORT TITLE:<br>Irene Pardo v. Costco Wholesale Corporation, et al. | CASE NUMBER:<br><b>CVSW2201409</b> |
|---|------------------------------------|

10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a.  Motor Vehicle
- b.  General Negligence
- c.  Intentional Tort
- d.  Products Liability
- e.  Premises Liability
- f.  Other (*specify*):

11. Plaintiff has suffered

- a.  wage loss
- b.  loss of use of property
- c.  hospital and medical expenses
- d.  general damage
- e.  property damage
- f.  loss of earning capacity
- g.  other damage (*specify*):

12.  The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a.  listed in Attachment 12.
- b.  as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1)  compensatory damages
- (2)  punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

- (1)  according to proof
- (2)  in the amount of: \$

15.  The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

Para. 1-15; GN-1; Prem. L-1, L-2, L-5

Date: March 1, 2022

Joseph H. Elias, Esq.

(TYPE OR PRINT NAME)

 /s/ Joseph H. Elias

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

PLD-PI-001(2)

SHORT TITLE:  
Irene Pardo v. Costco Wholesale Corporation, et al.

CASE NUMBER:  
**CV SW 2201 409**

FIRST \_\_\_\_\_  
(number)

## CAUSE OF ACTION—General Negligence

Page 4

ATTACHMENT TO  Complaint  Cross-Complaint

*(Use a separate cause of action form for each cause of action.)*

GN-1. Plaintiff (name): Irene Pardo

alleges that defendant (name): Costco Wholesale Corporation

Does 1 to 50 inclusive

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): March 13, 2020

at (place): 26610 Ynez Rd., Temecula, CA 92591

(description of reasons for liability):

Defendants, and each of them, owed a duty of care to Plaintiff because they owned, leased, rented, occupied, possessed, designed, constructed, developed, landscaped, operated, inspected, repaired, maintained, modified, managed, controlled, and/or supervised, the subject premises, and permitted or created the dangerous condition. Defendants' duty of care owed to Plaintiff further arose out of the fact that they knew of the dangerous condition and failed to rectify the dangerous condition.

Defendants, and each of them, breached the above mentioned duty of care because they negligently and carelessly owned, leased, rented, occupied, possessed, designed, constructed, developed, landscaped, operated, inspected, repaired, maintained, modified, managed, controlled and/or supervised the subject premises, permitted or created the dangerous condition, increased the risk of harm or created a false sense of safety (i.e., reliance on the undertaking) at the subject premises so as to cause Plaintiff to encounter a dangerous and deceptive condition, ultimately leading to Plaintiff's injuries.

PLD-PI-001(4)

SHORT TITLE:  
Irene Pardo v. Costco Wholesale Corporation, et al.

CASE NUMBER:  
**CV SVV2201 409**

SECOND

**CAUSE OF ACTION—Premises Liability**Page 5

(number)

ATTACHMENT TO  Complaint  Cross-Complaint

(Use a separate cause of action form for each cause of action.)

Prem.L-1. (name): Irene Pardo

alleges the acts of defendants were the legal (proximate) cause of damages to plaintiff.

On (date): 03/13/2020 plaintiff was injured on the following premises in the following

fashion (description of premises and circumstances of injury):

Defendants, and each of them, so negligently and carelessly owned, operated, maintained, controlled and inspected the subject premises so as to create and/or permit the existence of a dangerous condition of the subject premises and/or on the subject premises. The subject premises was in a dangerous condition at the time the injuries and damages were caused, and plaintiff's injuries were caused by this dangerous condition. The dangerous condition consisted of an unattended water spill at the subject premises, located at 26610 Ynez Rd, Temecula, CA 9259. As a direct result of Defendant's negligence, Plaintiff suffered, and continues to suffer, damages including, but not limited to, wage loss, loss of use of property, hospital and medical expenses, general damage, property damage and loss of earning capacity.

Prem.L-2.  Count One—Negligence The defendants who negligently owned, maintained, managed and operated the described premises were (names):

Costco Wholesale Corporation

 Does 1 to 50Prem.L-3.  Count Two—Willful Failure to Warn [Civil Code section 846] The defendant owners who willfully or maliciously failed to guard or warn against a dangerous condition, use, structure, or activity were (names): Does 1 to \_\_\_\_\_Plaintiff, a recreational user, was  an invited guest  a paying guest.Prem.L-4.  Count Three—Dangerous Condition of Public Property The defendants who owned public property on which a dangerous condition existed were (names):

L

 Does \_\_\_\_\_ to \_\_\_\_\_

- a.  The defendant public entity had  actual  constructive notice of the existence of the dangerous condition in sufficient time prior to the injury to have corrected it.
- b.  The condition was created by employees of the defendant public entity.

Prem.L-5.a.  Allegations about Other Defendants The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names): Does 1 to 50

- b.  The defendants who are liable to plaintiffs for other reasons and the reasons for their liability are  described in attachment Prem.L-5.b  as follows (names):

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